

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PERPETUAL ASHARE,

Plaintiff,

v.

SONTAG & HYMAN, P.C., MARC H.
HYMAN, EAST HARLEM MEC PARCEL C
LP., EAST HARLEM MEC PARCEL C
HOUSING FUND DEVELOPMENT
CORPORATION, METRO 125, INC., and
RICHTMAN PROPERTY SERVICES, INC.,

Defendants.

Civil Action No: 25-cv-02834-GHW-KHP

NOTICE OF MOTION

*Oral Argument Will be Held On A Date and
Time To Be Designated By the Court.*

PLEASE TAKE NOTICE, that upon the supporting memorandum of law and affidavit of Matthew K. Flanagan submitted in support thereof, Defendants SONTAG & HYMAN, P.C., and MARC H. HYMAN will move this Court for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff's Complaint and any crossclaims, in its entirety, based on its failure to state a claim upon which relief can be granted. This motion is made following the Initial Conference, which took place on July 10, 2025. Plaintiff declined an opportunity to amend.

Dated: New York, New York
September 3, 2025

Respectfully Submitted,
MARSHALL DENNEHEY, P.C.

By: 
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